

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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JOSHUA J. BELOW

by his Guardian, DEBRA BELOW,  
CHARLIE ELIZABETH BELOW., a minor  
By her Guardian ad Litem, DANIEL A. ROTTIER,

PATRICK JOSHUA BELOW., a minor  
by his Guardian ad Litem, DANIEL A. ROTTIER,

**CASE NO.: 3:15-cv-00529-wmc**

Plaintiffs,

DEAN HEALTH PLAN, INC.

Involuntary Plaintiff,

v.

STAR BLUE BELOW-KOPF

Intervening Plaintiff,

v.

YOKOHAMA TIRE CORPORATION,````  
ABC INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF AMERICA,  
DEF INSURANCE COMPANY,  
YOKOHAMA CORPORATION OF NORTH AMERICA,  
GHI INSURANCE COMPANY,  
YOKOHAMA TIRE MANUFACTURING VIRGINIA, LLC.,,  
JKL INSURANCE COMPANY,  
YOKOHAMA RUBBER COMPANY, LTD.,  
MNO INSURANCE COMPANY.

Defendants

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PLAINTIFFS' SUPPLEMENTAL INITIAL DISCLOSURE

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COMES NOW, Plaintiffs, by their attorneys, pursuant to Fed. R. Civ. P. 26(a),  
and in accordance with the principles governing fair and efficient discovery, submit their  
Supplemental Rule 26 Initial Disclosure.

Dustin Dill  
9040 County Road A  
Belleville, WI 53508

Mr. Dill took photographs of the subject Below truck within days of the accident and before any changes were made to the subject truck. He is expected to be called as a witness for the limited purposes of authenticating and identifying the photographs that he took.

Tom Griffing, adversely  
c/o Johnson Trent

Mr. Griffing was named as corporate designee for Yokohama for the first time on January 20, 2017. Plaintiffs expect to call him adversely on the subjects of his knowledge of other litigation and non-litigation claims involving the G051 tire, and more specifically, the LT line of these tires.

**Schaudenecker v. Yokohama**

(Defendants failed to fully respond to Plaintiff's Request for Production No. 24 and did not identify the above lawsuit. Its existence was discovered when Mr. Griffing was named as a witness)

Jarrold Fagan  
9023 West Yukon Drive  
Peoria, AZ 85382

Mr. Fagan was the driver of a pick-up truck, which utilized the Geolander HT/S light truck tire known as the G051. The tire experienced a detread and blowout causing Mr. Fagan to lose control of his truck resulting in an accident. Yokohama was sued and the case has since resolved. Mr. Fagan is expected to testify about the facts surrounding his accident, including the lack of controllability of his vehicle during the tire disablement.

**Dos Santos v. GM**

(Defendants failed to fully respond to Plaintiff's Request for Production No. 24 and did not identify the above lawsuit. Its existence was discovered when Mr. Griffing was named as a witness)

Eduaido Goncanves  
955 Airport Road  
Destin, FL 32541

Mr. Goncanves was the passenger of a van, which utilized the Geolander HT/S light truck tire known as the G051. The tire experienced a detread and blowout causing the driver of

the vehicle to lose control of the van resulting in an accident. Yokohama was sued and the case has since resolved. Mr. Goncanves is expected to testify about the facts surrounding this accident including the lack of controllability of this vehicle during the tire disablement.

Demetrius M. Jones  
1011 N.V. Drive  
Pensacola, FL 32505

Mr. Jones was the passenger of a van, which utilized the Geolander HT/S light truck tire known as the G051. The tire experienced a detread and blowout causing the driver of the vehicle to lose control of the van resulting in an accident. Yokohama was sued and the case has since resolved. Mr. Jones is expected to testify about the facts surrounding this accident including the lack of controllability of this vehicle during the tire disablement.

Jesus Mandujano  
100 Calhoun Street  
Destin, FL 32541

Mr. Mandujano was the passenger of a van, which utilized the Geolander HT/S light truck tire known as the G051. The tire experienced a detread and blowout causing the driver of the vehicle to lose control of the van resulting in an accident. Yokohama was sued and the case has since resolved. Mr. Mandujano is expected to testify about the facts surrounding this accident including the lack of controllability of this vehicle during the tire disablement.

**Maldonado v. Yokohama**

(Defendants failed to fully respond to Plaintiff's Request for Production No. 24 and did not identify the above lawsuit. Its existence was discovered when Mr. Griffing was named as a witness)

Victor Laredo  
Freer, TX

Mr. Laredo was the driver of a pick-up truck, which utilized the Geolander HT/S light truck tire known as the G051. The tire experienced a detread and blow-out causing Mr. Laredo to lose control of his truck resulting in an accident. Yokohama was sued and the case has since resolved. Mr. Laredo is expected to testify about the facts surrounding his accident including the lack of controllability of his vehicle during the tire disablement

Dated: January 27, 2017

/s/ Daniel A. Rottier  
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